

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF TEXAS
EL PASO DIVISION

ORALIA RAMON LOPEZ, Individually and)
on behalf of the Estate of JOSE ALFREDO)
AGUILAR HERNANDEZ, Deceased, and on)
behalf of Wrongful Death Beneficiaries,)
)
)
Plaintiff,)
)
)
v. No. 3:15-CV-00130-DCG
)
LE-MAR HOLDINGS, INC. d/b/a EDWARDS)
MAIL SERVICE, SHAUN MICHAEL)
LITTLEFIELD and EDWARDS MAIL)
SERVICE, INC.,)
)
Defendants.)

AGREED MOTION FOR ENTRY OF AGREED FINAL JUDGMENT

TO THE HONORABLE DAVID C. GUADERRAMA, UNITED STATES DISTRICT JUDGE:

COME NOW ORALIA RAMON LOPEZ, Individually and on behalf of the Estate of JOSE ALFREDO AGUILAR HERNANDEZ, Deceased, and as Next Friend of her minor sons A.A.R. and F.A.R., and on behalf of Wrongful death Beneficiaries, Plaintiff in the above-entitled and numbered cause, and LE-MAR HOLDINGS, INC., and EDWARDS MAIL SERVICE, INC., Defendants in the above-entitled and numbered cause, and file this their Agreed Motion for Entry of Agreed Final Judgment, and in support thereof would respectfully show the Court as follows:

1. The parties to this wrongful death and survival action have fully settled and compromised all matters in dispute between and among them, subject to Court approval of the settlement insofar as it encompasses the claims asserted on behalf of two minor plaintiffs: A.A.R. and F.A.R.

2. The Court has previously appointed Joshua Spencer as the Guardian Ad Litem to

represent the interests of the minor plaintiffs, A.A.R. and F.A.R. Mr. Spencer has submitted his report to the Court under seal and recommended that the proposed settlement be approved by the Court.

3. Attached hereto as Exhibit A is a proposed Agreed Final Judgment that gives effect to the proposed settlement. The Agreed Final Judgment disposes of all issues before the court in this cause. The parties and the Guardian Ad Litem respectfully move that the Court sign the Agreed Final Judgment submitted herewith and give effect to the settlement between and among them.

WHEREFORE, PREMISES CONSIDERED, Plaintiff ORALIA RAMON LOPEZ and Defendants EDWARDS MAILED SERVICE, INC. and LE-MAR HOLDINGS INC. pray that this motion be granted and that the Court sign and enter the Agreed Final Judgment attached hereto.

Respectfully submitted,

/s/Raul Steven Pastrana
State Bar No. 15560845
PASTRANA LAW FIRM
42 East Avenue
Austin, TX 78701
steven@pastranalaw.com
Telephone: (512) 474-4487
Facsimile: (512) 322-9885
Attorney for Plaintiff

and

/s/Joshua C. Spencer
1009 Montana
El Paso, Texas 79902
Tel: (915) 532-5562
Fax: (915) 532-7535
Joshua@joespencerlaw.com
State Bar No. 24067879
Guardian Ad Litem

and

/s/Ken Coffman

KEN COFFMAN

320 Texas Ave., 2nd Floor

El Paso, Texas 79901-1408

(915) 231-1945 (office)

(915) 225-0555 (fax)

ken@kclawfirm.net

State Bar No. 04497320

Attorney for Defendants EDWARDS MAIL
SERVICE, INC. and LE-MAR HOLDINGS
INC.